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Public Service Commission

November 6, 2001

VIA ELECTRONIC FILING

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW - TW-A325
Washington, DC 20554

Re: CC Docket No. 88-200, National Thousands-Block Number Pooling Rollout
Schedule

Dear Ms. Salas:

Forwarded herewith are comments of the Florida Public Service Commission regarding the Federal Communications Commission Public Notice in the above-captioned docket.

Sincerely,

/ s /

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

CBM:tf

cc: Brad Ramsay, NARUC

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
National Thousands-Block Number)	CC Docket No. 99-200
Pooling Rollout Schedule)	
)	DA 01-2419
)	

**COMMENTS ON THE NATIONAL THOUSANDS-BLOCK
NUMBER POOLING ROLLOUT SCHEDULE
BY THE FLORIDA PUBLIC SERVICE COMMISSION**

Introduction and General Comments

The Florida Public Service Commission (FPSC) submits these comments in response to the Federal Communications Commission (FCC) Public Notice released on October 17, 2001 seeking comments on the National Thousands-Block Number Pooling Rollout Schedule.

The FPSC considers thousands-block number pooling an integral part of number conservation efforts being made to ensure that the numbering resources in the North American Numbering Plan (NANP) are used efficiently. The FPSC generally supports the FCC's National Thousands-Block Number pooling Rollout Schedule, and would like to submit the following comments.

The Miami 305/786 area of the Miami-Ft. Lauderdale MSA should be included in the National Rollout Schedule.

Background

By Order DA-01-2419, issued October 17, 2001, the FCC issued its proposed National Rollout Schedule for Number Pooling for the first eight quarters. The rollout schedule for national thousands-block number pooling is divided into three-month segments, or

quarters. Starting in March 2002, number pools will be established in approximately 21 numbering plan areas (NPAs) each quarter, with an initial concentration on NPAs in the top 100 MSAs, and a special focus on jeopardy NPAs that are within the largest 100 MSAs. Pooling trials that have commenced before March 2002 will be transitioned into the national pooling administration program prior to the national pooling rollout.

The following Florida Metropolitan Statistical Areas (MSAs) and Numbering Plan Areas (NPAs) are included in the national rollout tentative schedule:

<u>Area Code</u>	<u>Placement</u>	<u>MSA</u>
407/321	1 st Quarter	Orlando
941	2 nd Quarter	Sarasota-Bradenton
727	3 rd Quarter	Tampa-St. Petersburg-Clearwater
352	4 th Quarter	Tampa-St. Petersburg-Clearwater
813	5 th Quarter	Tampa-St. Petersburg-Clearwater (mandatory)
863	7 th Quarter	Lakeland-Winter Haven
850	7 th Quarter	Pensacola

Although the Miami-Ft. Lauderdale MSA is the twelfth largest MSA in the country according to the 2000 Census¹, the 305/786 NPAs in the Miami-Dade area are not included on the tentative National Thousands-Block Number Pooling Rollout Schedule. This may be just an oversight caused by the fact that there is presently a state voluntary pooling trial in the 305 NPA. We emphasize that this voluntary trial is taking place only in the Keys area. A state

¹ Census 2000 PHC-T-3, Table 3

pooling trial was also implemented in the Ft. Lauderdale 954 NPA on January 22, 2001. The Miami area 305/786 NPAs are not, however, presently being pooled, nor are they scheduled to be pooled.

According to the 2000 Census², the Miami-Dade area, which includes the 305/786 NPAs, has a population of 2,253,362 people.

The FPSC believes it is crucial to include the Miami 305/786 NPAs in the National Thousands-Block Number Pooling Rollout Schedule to fulfill the number conservation goals of the State of Florida.

As required to substitute an alternative NPA³, the 305/786 NPAs in the Miami-Ft. Lauderdale MSA have a life span of at least one year (estimated exhaustion date-fourth quarter 2006), and are located within one of the top 100 MSAs (Miami-Ft. Lauderdale MSA is the twelfth largest).

Therefore, the FPSC respectfully requests that the 305/786 NPAs located in the Miami-Ft. Lauderdale MSA be included in the National Rollout Schedule. To accomplish this, the FPSC recommends that the Miami 305/786 NPAs be substituted for the Sarasota-Bradenton 941 NPA placement in the second quarter of the national rollout.

By Order No. DA 01-2479, released October 24, 2001, the FPSC received authority from the FCC to implement a state number pooling trial in the 941 NPA provided the pooling trial is initiated prior

² Census 2000 PHC-T-3, Table 1

³ DA 01-2419, page 2, ¶2

to the commencement of national pooling. Implementing the 941 NPA state pooling trial will allow for the placement of the Miami 305/786 NPAs in the second quarter of the national pooling rollout.

In conclusion, the FPSC respectfully requests that the 305/786 NPAs in the Miami-Ft. Lauderdale MSA be substituted for the 941 NPA in the Sarasota-Bradenton MSA for the second quarter of national pooling with all other Florida placements within the National Rollout schedule remaining the same.

Respectfully submitted,

/ s /

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/ s /

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DATED: November 6, 2001

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing comments will be mailed to the persons on the attached list.

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